

Subject: In Today's Federal Register - Comment dates set for Hawk Relay
Petition regarding Deaf Blind Relay Services

FEDERAL COMMUNICATIONS COMMISSION

[CG Docket No. 03-123; DA 07-4924]

Consumer & Governmental Affairs Bureau Seeks Comment on Petition for
Clarification Concerning the Provision of Deaf Blind Relay Service (DBRS)

AGENCY: Federal Communications Commission.

ACTION: Notice.

SUMMARY: In this document, the Commission's Consumer & Governmental Affairs
Bureau (Bureau) seeks comment on a petition for
clarification filed by Hawk Relay (Hawk) concerning the provision of Deaf
Blind Relay Service (DBRS Petition). Specifically, the Bureau seeks comment
on whether DBRS falls within the definition of Telecommunications Relay
Services (TRS) as set forth in section 225 of the Communications Act of
1934.

The DeafBlind Relay Service

For the purpose of clarification for this comment, the terminology of the word DeafBlind
also applies to individuals who are deaf or hard of hearing with severe vision loss, as well
as for those who have low vision or are blind with moderate to profound hearing loss.

I fully agree that the DeafBlind Relay Service model of providing Communication
Facilitators (CF) to individuals who are DeafBlind falls within the definition of
Telecommunications Relay Services (TRS) as set forth in section 225 of the Communication
Act of 1934.

For the most part TRS has already addressed the communication issues of the Deaf and
Hard of Hearing communities. My comment strictly focuses on the visual needs of the
DeafBlind community when using the TRS service.

I. Communication Preference

Due to the diversity of the DeafBlind community, there are about a half dozen
communication methods or preferences that DeafBlind people use. Some methods may
include:

- a. American Sign Language (ASL), Pidgen Sign Language (PSE) or Signing Exact
English (SEE)
- b. Speech
- c. Braille
- d. Print on Palm (POP)

I have also encountered quite a few DeafBlind individuals whose primary language is
Spanish. Therefore, they would require a CF who knows Spanish in addition to being
aware of the DeafBlind individual's visual needs.

For those with low vision, many cannot access the phone; relay service or VRS without assistance from a friend or family member. Some issues may be:

- a. They cannot see the visual display while using a TV or computer monitor, or TTY
- b. There is limited or non-existing tele-communication technology for low vision or Braille users
- c. There is no access to tele-communication for those who depend solely on Print on Palm (POP)

Back in the mid 1980s to the early 1990s, there were a few assistive devices that simplified or made it easier for DeafBlind individuals to access telecommunications.

For DeafBlind Braille users, the tele-braille has been the most favorite device in using the phone. Unfortunately this device has not been made for the last 12 years. Currently, one similar device is still being manufactured. But I've heard many comments from users that this particular device barely meets their communication needs, or does not meet their needs at all.

For the low vision users, the external Large Visual Display (LVD) was the favorite device to use when reading messages on the TTY. That too is no longer being made. There are a few TTY machines that have a slightly larger display, but sadly, many DeafBlind users cannot read it. This holds true with the Voice Carry Over (VCO) as many DeafBlind with good speech cannot read the display.

While technology with computers has made great advancement in the area of tele-communications, the use of these devices are limited to those who have the technical expertise to use it. For those who are technically challenged, the current computers and assistive equipment can be very complex. They require a large amount of time and energy to train the DeafBlind person to use it, providing if it available in their area. Often for many individuals, they have to travel a great distance to get the training, and they may have difficulty in getting the funds needed to participate in this training.

Without outside support in research and development, many companies specializing in assistive equipment do not have the resources to develop new or improve devices for the DeafBlind community. In addition, the devices continue to be expensive to make. The number of DeafBlind users is small and it is difficult to justify making a large number of devices at a more affordable cost for users.

A good number of DeafBlind individuals cannot access the TRS service due to their additional disabilities and who cannot qualify or on a waiting list for Personal Care Attendant (PCA). Some of the disabilities may include those who:

- a. Have limited or no use of their hands, thus preventing them from typing or signing
- b. Are mentally challenged and cannot communicate their thoughts in an understandable way during phone or VRS conversations.
- c. Cannot sign and have a speech impairment which cannot be understood by most people.

Communication Facilitators (CFs) will be able to adapt to and match the varied communication needs of most DeafBlind TRS users. Thus, I am writing in support of the DeafBlind Relay Service model of using communication facilitators so DeafBlind users will be able to access telecommunications services.

If you have any questions about my comment, I can be reached at ranpope@comcast.net.

Randall Pope